

# Appendix 3- City Plan 2040: SA Addendum

September 2025

## Introduction to this document

This SA addendum considers and assesses proposed changes made to the plan, known as Main Modifications which are considered necessary for soundness. It supplements the SA of the City Plan, January 2024: <https://www.cityoflondon.gov.uk/assets/Services-Environment/SA-Main-Report-Reg-19b.pdf>

This has been prepared to accompany the consultation on the Main and Additional modifications in December to January 2026.

## Stage 1- Screening of Main Modifications to the City Plan 2040

All the modifications made to the draft City Plan 2040 have been screened to consider which changes need to be assessed in the tables below. Additional modifications are automatically screened out because by their nature they cannot make a material change to the plan's policies and therefore would not change any effects identified in the assessment.

The screening includes three broad outcomes:

- Further assessment is not considered necessary as this relates to a factual change or update.
- Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
- Further assessment required as the amendments relate to a change in the policy requirements (which may include the detailed policy text or the policy application text).

Further detail is provided against each main modification giving reasons for each conclusion reached.

Where further assessment is identified as being required this was included in the updated policy assessments in Section 2. The changes were then assessed against each sustainability objective and then the cumulative impacts.

Table 1- Screening of Main Modifications

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 1 Strategic Priorities	City Plan Vision	MM1	Effective	<p><u>By 2040 the City of London will have become:</u></p> <ol style="list-style-type: none"> <li><b><u>A stronger, more vibrant and competitive economy.</u></b> The City of London has strengthened its position as a key driver of the UK economy by adding over 1.2 million square metres (NIA) of new office space, concentrated in two distinct tall building clusters at Fleet Valley and the City Cluster. This vibrant environment, with its efficient and interconnected supply chains, has attracted a more diverse mix of businesses, making the City of London an unparalleled place to work and conduct business.</li> <li><b><u>A 7-day-a-week destination.</u></b> The city's world-renowned heritage is now complemented by new cultural attractions like the London Museum. Viewing galleries offer unique perspectives of the capital, drawing visitors from across London, the UK, and beyond on every day of the week. These visitors stay longer to enjoy the wide array of leisure activities that have emerged to support the new cultural facilities. Local communities benefit from the increased diversity and availability of these offerings, making the city a safer and more engaging place to explore and learn.</li> <li><b><u>A more sustainable city-</u></b> The city has achieved its net zero aspirations and continues to lead in London's climate change adaptation and mitigation efforts. It champions low-carbon infrastructure and technologies. The sustainability credentials of new and repurposed business spaces, along with a visibly greener and more biodiverse environment, attract visitors and investors.</li> <li><b><u>A more inclusive and healthier city-</u></b> the city has been shaped by and for all of its communities, including those that live, work, visit, study or worship in the City, with physical and environmental enhancements making it more welcoming, safe, and inclusive for everyone. These improvements celebrate diversity and promote a healthy environment. Excellent public transport and increased opportunities for walking, cycling, and wheeling make the city more accessible and open to all.</li> <li><b><u>A place where heritage and positive change are celebrated-</u></b>the city has been reshaped for its communities, blending historic character seamlessly with modern, high-quality developments. It features new high quality public spaces and newly revitalised focal points for the city, creating a more harmonious urban landscape.</li> </ol>	Further assessment is not considered necessary as the amendments add further detail to the vision, rather than amend the aims and objectives of the plan and therefore would not change the effects already identified in the assessment.
Chapter 2 Spatial Strategy	Key Diagram	MM2	Positively prepared	<i>Change to include new Broadgate Tall Building Site on Key Diagram</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 2 Spatial Strategy	2.1 (10)	MM3	Positively prepared	10. Designated strategic and local views will inform development, with tall buildings focused in the City Cluster, <del>and</del> the Fleet Valley <u>and the Broadgate tall building site</u> , which are identified as areas suitable for tall buildings.	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 3 Health, Inclusion and Safety	HL2 (1)	MM4	Effective	HL2 (1) Developers will be required to effectively manage <del>the their proposal's impact of their proposals</del> on air quality. Major developments must comply with the requirements of the Air Quality SPD <del>for which includes requirements for Air Quality Neutral Assessments and</del> Air Quality Impact Assessments (AQIAs).	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	HL7 (2)	MM5	Effective	HL7 (2) Existing <del>public</del> sport and recreational facilities will be protected in situ, unless:	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.8.1	MM6	Effective	3.8.1 The City Corporation will protect existing <del>public</del> sports and recreation facilities in situ, where there is a need, and encourage the provision of new public and private facilities that meet Sport England's Active Design principles. Where in situ provision is not feasible, services should be delivered from other facilities without reducing the level of provision. However, any proposals involving the loss of <del>public</del> sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Current <del>public</del> facilities and uses should be retained where a continuing need exists. <u>However, the loss of private facilities may be acceptable in certain circumstances to allow suitable responses to market demand and effective business planning.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy. Modification would not change the effects already identified in the assessment.
Chapter 3 Health, Inclusion and Safety	3.10.1	MM7	Effective	3.10.1 Major development can impact on health in a variety of ways including through noise and pollution during the construction phase, increased traffic movements and greater competition for limited open space. Equally, development can deliver improvements such as improved access by walking, wheeling, cycling and public transport and the provision of opportunities to access open and green spaces, exercise facilities, cultural and community facilities and healthy food outlets. <u>For the application of this policy a rapid HIAs will be required where developments involve an uplift of 1,000sqm.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 4 Housing	S3 (2) (a) S3 (2) (b)	MM8	Positively prepared	2. Ensuring sufficient affordable housing is provided. <u>Incentivising affordable housing delivery</u> to meet the City's housing need and contributing to London's wider housing needs by: a. ensuring the delivery of <u>applying the Mayor's threshold approach of a minimum of 35% affordable housing and a minimum of 50% affordable housing on public sector land</u> ; b. requiring residential developments with the potential for 10 or more units to provide a minimum of 35% affordable housing on-site. Exceptionally, new affordable housing may be provided off-site, or through an equivalent cash in lieu payment, if evidence is provided to the City Corporation's satisfaction that on-site provision cannot be satisfactorily delivered and is not viable; and c. providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing and <u>where appropriate</u> intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale. 3. Requiring a publicly accessible viability and feasibility assessment to be submitted to justify any proposals that do not meet on-site or off-site affordable housing requirements in this policy. Where policy targets are not able to be met when an application is decided, the City Corporation will require an upwards only review mechanism to be applied to ensure that the benefits of any subsequent uplift in values or reduction in costs are reflected in affordable housing contributions.	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment																																				
Chapter 4 Housing	4.1.12	MM9	Effective	4.1.12- The City Corporation’s Article 4 Direction, which removes permitted development rights for the change of use of offices to residential, the size and commercial character of the City and the priority given to commercial development through London Plan Policy SD5, all mean that new housing development in the City of London has been delivered through ‘windfall’ development rather than through the allocation of sites. <del>City Corporation monitoring shows that in the period 2011/12 to 2022/23, completions and permissions on windfall sites will have delivered an annual average of 175 dwellings per year. It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.</del> It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.																																				
Chapter 4 Housing	New paragraph	MM10	Effective	<p><i>New paragraph after 4.1.12 (and subsequent paragraphs 4.1.13 to 4.1.15 renumbered)</i></p> <p><u>4.1.13 The City Plan includes housing delivery information at Table 1 below and a trajectory of anticipated completions against the relevant targets at Appendix 2. Table 1 below shows completions and projected completions which exceed the target of 1460 housing units over the ten-year period of the London Plan from 2019/20 to 2028/29.</u></p> <p><u>Appendix 2 shows delivery against the London Plan target from 2019/20 to 2028/29 and the standard method output of 102 per annum from 2029/30 to 2039/40. This reflects the requirement for strategic policies to cover the 15 years post plan adoption. This also shows anticipated exceedance of the targets.</u></p> <p><u>Table 2- Housing Delivery (Source City Corporation Monitoring data)</u></p> <table border="1"> <thead> <tr> <th>Year</th> <th>Numbers (after any conversion)</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td><u>2019/20</u></td> <td>296</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2020/21</u></td> <td>202</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2021/22</u></td> <td>433</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2022/23</u></td> <td>96</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2023/24</u></td> <td>0</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2024/25</u></td> <td>29</td> <td><u>Completions</u></td> </tr> <tr> <td><u>2025/26</u></td> <td>41</td> <td><u>Completions (projected)</u></td> </tr> <tr> <td><u>2026/27</u></td> <td>97</td> <td><u>Completions (projected)</u></td> </tr> <tr> <td><u>2027/28</u></td> <td>580</td> <td><u>Completions (projected)</u></td> </tr> <tr> <td><u>2028/29</u></td> <td>342</td> <td><u>Completions (projected)</u></td> </tr> <tr> <td></td> <td><b>2,116</b></td> <td></td> </tr> </tbody> </table>	Year	Numbers (after any conversion)	Status	<u>2019/20</u>	296	<u>Completions</u>	<u>2020/21</u>	202	<u>Completions</u>	<u>2021/22</u>	433	<u>Completions</u>	<u>2022/23</u>	96	<u>Completions</u>	<u>2023/24</u>	0	<u>Completions</u>	<u>2024/25</u>	29	<u>Completions</u>	<u>2025/26</u>	41	<u>Completions (projected)</u>	<u>2026/27</u>	97	<u>Completions (projected)</u>	<u>2027/28</u>	580	<u>Completions (projected)</u>	<u>2028/29</u>	342	<u>Completions (projected)</u>		<b>2,116</b>		Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.
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Appendix 2	New appendix	MM11	Effective	<p>The housing trajectory below shows delivery against the targets over the plan period, as set out in the London Plan, and for years 2029/30 onwards as included within Strategic Policy S3 and paragraph 4.1.11-13.</p> <p>*the London Plan target of 146 per annum has been used for 2019/20 until 2028/29 and then 102 from the standard methodology for the remainder of the plan period to 2039/40</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Target* per annum</th> <th>Units</th> <th>Status</th> </tr> </thead> <tbody> <tr><td>2025/26</td><td>146</td><td>41</td><td>Completions (projected)</td></tr> <tr><td>2026/27</td><td>146</td><td>97</td><td>Completions (projected)</td></tr> <tr><td>2027/28</td><td>146</td><td>580</td><td>Completions (projected)</td></tr> <tr><td>2028/29</td><td>146</td><td>342</td><td>Completions (projected)</td></tr> <tr><td>2029/30</td><td>102</td><td>0</td><td>Completions (projected)</td></tr> <tr><td>2030/31</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2031/32</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2032/33</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2033/34</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2034/35</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2035/36</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2036/37</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2037/38</td><td>102</td><td>120</td><td>Completions (windfalls)</td></tr> <tr><td>2038/39</td><td>102</td><td>190</td><td>Completions (windfalls and capacity)</td></tr> <tr><td>2039/40</td><td>102</td><td>220</td><td>Completions (windfalls and capacity)</td></tr> <tr> <td><b>Total</b></td> <td><b>1,706</b></td> <td><b>2,430</b></td> <td></td> </tr> </tbody> </table>	Year	Target* per annum	Units	Status	2025/26	146	41	Completions (projected)	2026/27	146	97	Completions (projected)	2027/28	146	580	Completions (projected)	2028/29	146	342	Completions (projected)	2029/30	102	0	Completions (projected)	2030/31	102	120	Completions (windfalls)	2031/32	102	120	Completions (windfalls)	2032/33	102	120	Completions (windfalls)	2033/34	102	120	Completions (windfalls)	2034/35	102	120	Completions (windfalls)	2035/36	102	120	Completions (windfalls)	2036/37	102	120	Completions (windfalls)	2037/38	102	120	Completions (windfalls)	2038/39	102	190	Completions (windfalls and capacity)	2039/40	102	220	Completions (windfalls and capacity)	<b>Total</b>	<b>1,706</b>	<b>2,430</b>		Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. The housing target remains the same as per the London Plan, changes refer to delivery trends and expectations only.
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Chapter 4 Housing	4.1.8	MM12	Positively prepared	<p>4.1.8 .... In line with the findings of the SHLAA, the London Plan requires the City of London to deliver 1,460 new homes during the period 2019/20 – 2028/29. This includes the 740 units that the London Plan sets as a target to be provided on small sites of less than 0.25 hectares in size over the 2019/20 – 2028/29 period. Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan’s target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. <u>Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum will remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the current digital SHLAA for the upcoming London Plan to identify additional capacity and the setting of housing targets in the draft new London Plan, the outputs of which will be used to inform targets in the period post 2028/29.</u></p>	Further assessment is not considered necessary as the amendments provide further clarity rather to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.																																																																				
Chapter 4 Housing	4.1.10	MM13	Effective	<p>4.1.10 ... This Local Plan therefore seeks to meet the City of London’s London Plan housing target between 2025/26 and 2029/30 (an average 146 dwellings per annum for the first 4 years and 102 dwellings in the fifth year) and to meet the housing requirement identified by the national standard method from 2030/31 up to 2039/40...</p>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.																																																																				

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Chapter 4 Housing	4.1.11	MM14	Effective	<del>4.1.11 The City Corporation's housing pipeline shows that approved applications would result in completions for the first five year plan period (2025/26 to 2029/30) of 570 units. This would be below the housing requirement for the first five years of the Plan, which is 686; however, it is expected that sufficient windfall sites would come forward to meet the housing requirement in the City Plan.</del>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	4.1.15	MM15	Effective	<u>4.1.15. ...The City Corporation will work with the Mayor and London Boroughs in the preparation of a forthcoming GLA London-wide Gypsy and Traveller Accommodation Needs Assessment. If a need for such accommodation in the City was identified through this study, the City Corporation would utilise the London Plan policy and targets.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 4 Housing	HS6 (2)	MM16	Effective	HS6 (2) Proposals for PBSA should be supported by <u>and secured through a nominations agreement with an</u> identified further or higher educational institutions operating in the City of London or the CAZ.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change clarifies the London Plan approach.
Chapter 5 Offices	S4 (1)	MM17	Effective	Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 <u>NIA (1,600,000 m2 GIA)</u> net during the period 2021 to 2040, phased as follows: <ul style="list-style-type: none"> <li>• 2021 – 2026 500,000m2 <u>NIA (666,666m2 GIA)</u></li> <li>• 2026 – 2031 400,000m2 <u>NIA (533,333m2 GIA)</u></li> <li>• 2031 – 2036 200,000m2 <u>NIA (266,666m2 GIA)</u></li> <li>• 2036 – 2040 100,000m2 <u>NIA (133,333m2 GIA)</u></li> </ul>	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.1.1	MM18	Effective	The <u>minimum requirement of overall office floorspace target of 1,200,000m2 net internal area (or 1,600,000m2 GIA)</u> is derived from the estimated growth in office employment between 2021 and 2040...	Further assessment is not considered necessary as the amendments provide further clarity on the measure of the minimum requirement in GIA and NIA. They do not change the policy requirements, therefore would not change the effects previously assessed.
Chapter 5 Offices	5.3.9	MM19	Effective	5.3.9...Where a change <del>in</del> <u>of</u> use is proposed from office floorspace to another use,...  ....It would also include where the change of use of office floorspace at ground and lower ground levels improves the vibrancy of an area by introducing more active frontages and delivering more permeable buildings and spaces. <u>Proposals involving a change of use to residential will be expected to provide viability assessments where not within or adjacent to the residential area. ....</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text and do not change the policy requirements, therefore would not change the effects previously assessed.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment									
Chapter 7 Culture and Visitors	7.1.5	MM20	Effective	7.1.5 The City Corporation's Cultural Planning Framework (CPF) identifies focal areas across the Square Mile, and sets a broad framework that new cultural infrastructure, visitor attractions and complementary facilities will be expected to help realise. <u>When developing cultural proposals, applicants are expected to consider the recommendations of the CPF, however, following the adoption of the plan, the City Corporation will produce and consult on a Culture SPD.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to the CPF, and do not change the policy requirements, therefore would not change the effects previously assessed.									
Chapter 7 Culture and Visitors	New paragraph after 7.3.3	MM21	Effective	<p><i>New paragraph 7.3.4</i></p> <p><u>Part two of the policy requires on site provision for developments of 10,000sqm gross or more, regardless of the uplift in floorspace, but does not dictate the scale of the provision. The capacity of developments to incorporate a cultural use will be determined on a site by site basis and will be commensurate with the scale of the development.</u></p> <table border="1"> <thead> <tr> <th></th> <th>On Site</th> <th>Off Site</th> </tr> </thead> <tbody> <tr> <td><u>&gt; 10,000sqm gross floorspace</u></td> <td><u>Yes. Provision will be commensurate with the scale of development</u></td> <td><u>Not acceptable</u></td> </tr> <tr> <td><u>&lt; 10,000sqm gross floorspace</u></td> <td><u>Preferred. Provision will be commensurate with the scale of development</u></td> <td><u>Yes if a specific project has been approved. Provision can be through a direct intervention to support the project through a financial contribution in accordance with paragraph 7.3.5, financial contributions can be pooled.</u></td> </tr> </tbody> </table>		On Site	Off Site	<u>&gt; 10,000sqm gross floorspace</u>	<u>Yes. Provision will be commensurate with the scale of development</u>	<u>Not acceptable</u>	<u>&lt; 10,000sqm gross floorspace</u>	<u>Preferred. Provision will be commensurate with the scale of development</u>	<u>Yes if a specific project has been approved. Provision can be through a direct intervention to support the project through a financial contribution in accordance with paragraph 7.3.5, financial contributions can be pooled.</u>	Further assessment is not considered necessary as the amendments provide further clarity to the supporting text in relation to scale, and do not change the policy requirements, therefore would not change the effects previously assessed.
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Chapter 7 Culture and Visitors	CV4 (2)	MM22	Effective	CV4 (2) Do not result in <u>unacceptable</u> adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.									
Chapter 8 Infrastructure	IN2	MM23	Effective	<p>1. Development must not lead to capacity or reliability issues in the surrounding area and <u>should therefore be designed to operate efficiently, while maintaining a high standard of infrastructure provision for occupiers capacity projections must take into account the impacts of climate change which will influence future infrastructure demand.</u></p> <p>2. Developers are required to <u>demonstrate, through effective engagement with provide evidence that they have engaged with infrastructure providers at an early stage to seek to ensure that adequate utility infrastructure will be provided, both on and off the site, to serve the development during construction and operation, and that they have co-operated (where appropriate) with infrastructure providers to minimise disruption. New major residential and major non-residential development will need to provide information as part of a planning application that shows early engagement by the applicant with the sewerage and water supply network provider, to demonstrate the provider can meet their duty to ensure there is adequate water supply, foul drainage and sewage treatment capacity to serve the development.</u></p> <p>3. Where potential capacity problems are identified, and no improvements are programmed by the utility company, the City Corporation will require developers <u>to demonstrate that they have sought to work collaboratively with utility providers to facilitate appropriate improvements, which may require the provision of and have explored and (where feasible) provided space within new developments for on-site infrastructure or off-site infrastructure upgrades.</u></p> <p><i>Policy clauses 2 and 3 renumbered.</i></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment. Change provides clarity through reference to separate statutory regime covering the sewerage and water supply network, to ensure responsibilities for developers and infrastructure providers are made clear.									

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 9 Design	9.1.0	MM24	Effective	9.1.0 As a world leading financial and professional services centre, with many important heritage assets and high quality buildings, the City requires world leading design in all aspects of the built environment, including the sustainability of new, <u>retrofitted</u> and refurbished buildings.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.3	MM25	Effective	9.1.3 An understanding of the potential for retaining and retrofitting existing buildings should therefore be the starting point for appraising site options, alongside a robust analysis of the <u>whole life-cycle</u> carbon of different development approaches.	Further assessment is not considered necessary as the amendments provide further clarity and would not change the effects previously assessed.
Chapter 9 Design	9.1.4	MM26	Effective	9.1.4 Options appraisals should also be informed by the potential for wider environmental <u>sustainability</u> benefits for the site, <u>its context and the whole City</u> before considering <del>the many wider other</del> design and planning matters set out in this policy and other policies throughout the Plan, and using this work to inform the design of the proposed scheme.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.1.5	MM27	Effective	<u>9.1.5 Development with a substantial embodied carbon impact should seek to incorporate environmental sustainability benefits on site or to contribute to offsite measures in the wider local area that contribute to substantial improvements for the sustainability of the City. Opportunities for such measures may vary on a site by site basis due to the specifics of the location, context, building use and type of a site.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (1)	MM28	Effective	DE1 (1) Development proposals should <del>follow</del> <u>adopt</u> a retrofit first approach, <del>thoroughly exploring the potential for retaining and retrofitting.</del> <u>At the project outset, potential options for retention and retrofit should be explored to reduce carbon emissions and material waste.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (3)	MM29	Effective	DE1 (3) Development proposals should minimise whole life-cycle carbon emissions. Major developments must submit a whole life-cycle carbon assessment <u>at planning stage and post construction.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to whole life carbon assessments and would not change the effects already identified in the assessment.
Chapter 9 Design	DE1 (7)	MM30	Effective	7. Development should be designed to incorporate circular economy principles throughout the life-cycle of the building through: a. Flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment; b. Floorspace adaptability to maximise the lifespan of buildings; c. <u>Retention, refurbishment, retrofit and reuse</u> <del>Reuse, refurbishment and retention</del> of existing buildings, structures and materials to reduce reliance on virgin resources; d. Designing for disassembly, reuse and recycling of deconstruction materials; e. Maximum use of recycled materials in development and off-site construction methods to reduce wastage; and f. Designs which enable durability, modularity, sharing of goods and services and reuse of supplies and equipment, minimising waste during the building's operational phase	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 9 Design	DE1 (8)	MM31	Effective	<p>DE1 (8) Proposals for major development will be required to:</p> <p>a. Achieve a minimum BREEAM rating of “excellent” and aim for “outstanding” against the current, relevant BREEAM criteria at the time of application, obtaining maximum credits for the City’s priorities (energy, water, materials, waste and pollution). <del>Climate resilience credit should be achieved for the waste category. The adaption to climate change credit Wst 05 must be achieved in the waste category;</del></p> <p><u>b. Commit to achieving a minimum NABERS UK rating of 5 stars; Commit to a minimum NABERS UK Base Build energy rating of 5 stars for new build and 4 stars for retrofit developments (offices only);</u></p> <p>c. Demonstrate that London Plan guidance on <u>operational</u> carbon emissions and air quality requirements have been met on site.</p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.0	MM32	Effective	<p>9.2.0 Materials – <del>retaining</del> <u>reducing</u> embodied carbon <del>emissions from new build construction through retrofit and in-existing buildings and materials, and improving</del> resource efficiency.</p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 9 Design	9.2.9	MM33	Effective	<p>9.2.9 For major development (<u>where the floorspace to be created by the development is 1,000sqm+, the site is 1 hectare or more, a residential development of 10+ dwellings, or a residential development on a site of 0.5 hectares or more</u>) the following information should be provided:</p> <ul style="list-style-type: none"> <li>- A BREEAM pre-assessment or design stage assessment including a summary of the credits to be targeted in each category. Planning conditions will be used to require submission of a post construction BREEAM certificate to demonstrate implementation of the approved designs, achievement of the City’s priority credits and identify any performance gaps between design and completed development.</li> <li>- <u>A Design for Performance (DfP) Agreement to the required Base Build NABERS UK energy rating (offices only). The DfP Agreement should set out how the design intent for energy efficiency will be maintained from design through to occupation and rating. Planning conditions will be used to require submission of a NABERS certificate after the rating period.</u></li> <li>- An energy assessment in line with the Mayor of London’s Energy Planning Guidance</li> <li>- An options appraisal following the City Corporation’s Carbon Options Guidance Planning Advice Note to develop a low carbon solution that optimises social, economic and environmental sustainability benefits</li> <li>- An air quality assessment to meet the requirements of the London Plan demonstrating that the development will <del>not result in deterioration in air quality</del> <u>be at least Air Quality Neutral</u>, in line with the City of London Air Quality SPD.</li> <li>- <u>Details of collective infrastructure and other environmental sustainability improvements for the site, its context or the City as a whole, which has been incorporated to address environmental challenges.</u></li> <li>- Details of the proposed adaptation and resilience measures to make the building resilient to the climate and weather patterns it will encounter during its lifespan.</li> <li>- <u>Whole life-cycle (WLC) carbon assessments in line with the London Plan Guidance and City Corporation’s Carbon Options...</u></li> </ul>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 9 Design	9.2.9	MM34	Effective	<p><b>9.2.9 Extensions</b></p> <p><del>▲ If a development proposal includes an extension greater than 25% of the existing floorspace or consists of a distinct structure greater than 1,000sq.m, the extension on its own should be treated as a major development and assessed accordingly, including consideration of London Plan carbon emission targets, carbon options appraisal and BREEAM requirements.</del></p> <p><b>For minor development</b></p> <ul style="list-style-type: none"> <li>• Although minor development may provide more limited opportunities for the incorporation of sustainability features it is important that sustainability is considered at the design stage for all projects. For most minor development inclusion of sustainability information in the Design and Access Statement will suffice.</li> <li>• <u>For minor development that includes substantial works (including substantial retrofit, extension), more detailed sustainability information may be requested to demonstrate policy alignment, such as consideration of London Plan carbon emission targets, carbon options appraisal or BREEAM requirements.</u></li> </ul>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements or standards, and would not change the effects already identified in the assessment.
Chapter 9 Design	DE4 (3)	MM35	Effective	3. Requiring all tall buildings <del>or major developments</del> to provide free to enter....	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	VT3 (4)	MM36	Effective	4. All off-street <u>non-residential bays for</u> car parking facilities must be equipped with <u>active</u> electric vehicle charging points <u>usable from the outset.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT1 (c)	MM37	Effective	<u>AT1 (c) Opportunities to enable improved and new connections through to mainline railway stations to promote use.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and would not change the effects already identified in the assessment.
Chapter 10 Transport	AT3 (2)	MM38	Effective	AT3 (2) <u>In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office developments, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations.</u> All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 10 Transport	10.10.1	MM39	Effective	10.10.1 A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. <u>A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision. Exceptional circumstances in relation to the provision of long stay cycle parking are likely to relate to individual site constraints.</u> <u>This could include when the provision of long stay cycle parking would require the excavation and construction of a larger basement than the existing, where this would result in significant embodied carbon emissions.</u>	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 10 Transport	10.10.2	MM40	Effective	<u>10.10.2 The temporary use of cycle parking areas for other ancillary functions may be acceptable where it is demonstrated that there is a lack of demand for cycle parking. Utilisation will be monitored through Travel Plans and cycle parking will need to be reintroduced as demand rises.</u>  <i>Existing wording in 10.10.2 to move to 10.10.3, etc.</i>	AT3- Further assessment required as the amendments relate to a change in the policy requirements. Assessment to be undertaken for AT3 and its supporting text.
Chapter 11 – Heritage and Tall Buildings	HE1 (6)	MM41	Effective	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area <del>and its setting</del> . The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be <del>considered</del> <u>sought where appropriate</u> ;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.6	MM42	Effective	<u>All new development, including tall buildings, within a conservation area will need to demonstrate how it would preserve and (where possible) enhance the conservation area.</u> In the design of new buildings or the alteration of existing buildings, developers should have regard to the character of conservation areas and their settings. This includes the size and shape of historic building plots, existing street patterns and the alignment and the width of frontages, materials, vertical and horizontal emphasis, layout and detailed design, bulk and scale, including the effects of site amalgamation on scale, and hard and soft landscaping. Regard should be paid to the richness, variety and complexity of the architectural form and detailing of buildings and to the broader character of the area.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.12	MM43	Effective	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	11.2.13	MM44	Effective	The City Corporation’s Character Areas Study provides an overview of the City’s overall significance including a Statement of Significance for key strategic assets, like St Paul’s Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <u>Many aspects of the St Paul’s Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u> Applicants should draw reference to the Character Areas Study <u>and the Setting Study (where appropriate)</u> to understand their site’s significance and the key attributes of significance they should consider	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements, instead reflecting how Setting Study will be utilised. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.3.8	MM45	Effective	11.3.8 On sites where significant archaeological artefacts <u>or features</u> are discovered, there would be a presumption to retain them on site and display them in the most optimal place for appreciation by the public.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	HE3 (1)	MM46	Effective	1. Applicants will be required to submit a Heritage Impact Assessment along with the planning application <u>that shows how the OUV of the Tower of London has been interpreted.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.4.0	MM47	Effective	<u>11.4.0a The City Corporation has interpreted the ToL's OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL's OUV, as experienced in the relevant views, including those where the City Cluster is visible.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance and London Plan approach. Modification would not change the effects already identified in the assessment.
Chapter 11 – Heritage and Tall Buildings	S12 (2)	MM48	Effective	2. The tall building areas identified on the Policies Map and Figure 14 ( <u>City Cluster, Fleet Valley and Broadgate site</u> ) are areas where tall buildings may be appropriate, subject to the requirements in this and other relevant policies	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change
Chapter 11 Heritage and Tall Buildings	S12 (3)	MM49	Effective	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <u>respects both heritage significance and</u> townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	S12 (8) (c)	MM50	Effective	8c. the significance of heritage assets and their <del>immediate and wider</del> settings.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 11 Heritage and Tall Buildings	11.5.4	MM51	Effective	<del>For the purposes of Policy D9 of the London Plan, the</del> <u>The tall buildings areas identified as being appropriate locations for tall buildings</u> are the City Cluster, <del>and Fleet Valley and Broadgate Tall Building Site</del> areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new tall buildings, particularly on sites where there is no tall building currently,</u> would be likely to <u>have</u> significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text. Broadgate tall building site to be assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.6	MM52	Effective	11.5.6 The heights of the buildings in the City Cluster, <del>and Fleet Valley and Broadgate Tall Building site</del> areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. <del>Both These</del> areas were assessed based on <u>specific criteria, including</u> the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views, <del>and local strategic views.</del>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change. Note- assessment also to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 14	MM53	Positively prepared	<i>Change to show new Broadgate Tall Building Site as an area suitable for tall buildings</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site. Note- assessed under the Key Diagram change.
Chapter 11 Heritage and Tall Buildings	11.5.12	MM54	Effective	11.5.12 All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <u>historic environment, townscape and skyline, including their cumulative effects.</u>	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	New paragraph after 11.5.12	MM55	Effective	<i>New paragraph after 11.5.12 (and renumber after)</i>  <u>On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.</u>	S12- Further assessment required as the amendments relate to a change in the policy requirements in relation to Tall Buildings. Assessment to be undertaken for S12 and its supporting text.
Chapter 11 Heritage and Tall Buildings	Figure 15	MM56	Positively prepared	<i>Change to show amendment to city cluster tall buildings contours at southeastern corner and Broadgate Tall Building Site contours</i>	Further assessment required as the amendments relate to a change in the policy requirements on the Broadgate tall building site and amendments to the contours at SE corner of City Cluster. Note- assessed under the Key Diagram change.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 11 – Heritage and Tall Buildings	S13	MM57	Effective	2. Protecting and enhancing significant local views of St. Paul’s Cathedral, through the City Corporation’s St. Paul’s Heights code and local views from the Fleet Street, Ludgate Circus and Ludgate Hill processional route; the setting and backdrop to the Cathedral; significant local views of and from the Monument; and views <u>and the settings</u> of historic City landmarks and skyline features;	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national guidance. Modification would not change the effects already identified in the assessment.
Chapter 12 Open Spaces and Green Infrastructure	12.3.4	MM58	Effective	12.3.4 The City Corporation has long championed green roofs and continues to actively encourage them. The City Corporation will seek the provision of trees and landscaping in all development where this is possible <u>and appropriate, including through the design of public realm and sustainable drainage systems.</u> This can <del>can</del> take many forms and require careful design, installation and regular maintenance.	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	S15	MM59	Effective	<u>Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.</u> <del>1. Development must minimise the risk of overheating and any adverse contribution to the urban heat island effect;</del> <del>2. Development must address the impacts of the urban heat island effect;</del> <del>3. Development must avoid placing people or essential infrastructure at increased risk from river, surface water, sewer or groundwater flooding;</del> <del>4. Flood defence structures must be safeguarded and enhanced to maintain protection from sea level rise; and</del> <del>5. Development should contribute towards making the City more resilient and should seek opportunities to integrate into wider climate resilience measures in the City.</del>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements in relation to over-heating. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	13.1.2-3	MM60	Effective	<u>13.1.4 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</u>  <u>13.1.5 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 13 Climate Resilience	CR1	MM61	Effective	<del>2. Building designs should minimise any contribution to the urban heat island effect. Development should prepare for and adapt to future climate scenarios and rising temperatures. Building design including materiality, energy strategies, and greening must minimise urban heat island effects. Development should consider future weather projections to ensure heat risk is addressed over the development lifespan. Opportunities should be sought to incorporate features that provide shade and shelter in the public realm.</del>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification on reason	Amended text	Screening Assessment
Chapter 13 Climate Resilience	13.2.2	MM62	Effective	<p><del>13.2.2 For all major development, the City Corporation will require climate adaptation and resilience to be addressed at the design stage. Sustainability Statements should include details of the proposed adaptation and resilience measures. Energy statements should demonstrate how energy demand for cooling will be minimised. BREEAM credits for adaptation to climate change should be targeted.</del></p> <p><del>13.2.3 For minor development, the Design and Access Statement should include details of climate resilience and adaptation measures.</del></p> <p><u>13.2.2 Designing for present weather conditions will leave buildings vulnerable to changes in climate. UK Climate projections (UKCP18) and CIBSE Future Design Summer Year (DSY) provide future weather data for London. Development should take into consideration future weather projections to identify the impacts of a changing climate. A better understanding of the impacts of the changing climate should help developments integrate adaptive design measures that increase the resilience of their buildings and address the urban heat island effect, now and into the future.</u></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 Temple, Thames Policy Area and KOAC	S21 (6)	MM63	Effective	<p>6. Ensuring development proposals have regard to the <del>immediate</del> setting of Bevis Marks Synagogue <del>(as set out in the Policy Map).</del></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S23 (new 14)	MM64	Effective	<p><u>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</u></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S24 (9)	MM65	Effective	<p><del>9. Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;</del></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements. Modification would not change the effects already identified in the assessment.
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	S25: Liverpool Street	MM66	Effective	<p><u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site and any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u></p>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.

Chapter	Paragraph	MM number	Main modification reason	Amended text	Screening Assessment
Chapter 14 The Temple, the Thames Policy Area and the Key Areas of Change	14.10.1	MM67	Effective	14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u>	Further assessment is not considered necessary as the amendments do not substantially change the policy requirements and reflects national policy and guidance in relation to conservation areas. Modification would not change the effects already identified in the assessment.
Chapter 15 Implementation	Policy S26	MM68	Effective	<u>(2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations.</u>  <i>Renumber parts 2 and 3.</i>	Further assessment is not considered necessary as the amendments provide further clarity on the application of requirements within the London Plan rather than substantially change policy, and would not change the effects previously assessed.

The above process has identified the need for further appraisal of the following policies and their supporting text:

- Policy AT3 Cycle Parking
- Policy S12 Tall Buildings
- Key Diagram (other Figures) - identification of new Tall Building site at Broadgate and contour amendments at SE corner of City Cluster

## Stage 2- Updated policy assessments

The amendments to the plan identified as having potential implications for the assessment are listed below. The submission policy assessment has been included alongside that with amendments. The commentary sets out the implications for the change on each sustainability objective.

### Interpretation of results: Keys

This appraisal shows the changes to the plan under the MMs against each of the sustainability objectives of the SA. It reproduces the information from the initial appraisal and utilises the same key to highlight any changes to the assessment as a result. Where a change from the previous assessment is identified this is identified as a change through 'C'.

Key from 2024 Sustainability Appraisal:

	Impact of implementing policy	Response to SA assessment
↑	Significant positive effect	Consider whether further enhancement is possible
↑	Positive effect	Consider whether further enhancement is possible
↕	Uncertain effect	Consider policy wording changes and/or mitigation and monitoring
↑↓	Both positive and negative effect (minor rather than significant)	Consider policy wording changes and/or mitigation and monitoring
↓	Negative effect	Consider policy changes and/or mitigation
↓	Significant negative effect	Consider changing the policy
-	Negligible effect	

2025 Key

SP	Strong positive effect
P	Positive effect
N	Negative effect
P/N	Both positive and negative effects
U	Uncertain effect
C	Change to previous effect

**Modification Assessment 1- Policy AT3: Cycle Parking**

Main Modification numbers: MM38-40.

Sets out circumstances where cycle provision below the London Plan standards may be acceptable, including where extensive basement excavation would be required to meet the standard, with embodied carbon implications. Change highlights that where applicable this will be secured through S106 and will be proportionate to the under-provision. Sets out temporary use of cycle provision for other uses may also be acceptable where a lack of demand has been identified, to be monitored through Travel Plans.

Table 3- Policy AT3 Cycle Parking

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P/N	P			P	P			P			P		SA identifies effects of draft policy in relation to: <ul style="list-style-type: none"> <li>Facilitating active travel reduces emissions from vehicles.</li> <li>Provision of conveniently located, easily accessible, safe and secure changing facilities and cycle parking encourages active travel.</li> <li>Reduces space for offices but attracts City workers.</li> <li>Keeps streets clear for short-stay cycle parking.</li> <li>Provides secure cycle storage – reduced opportunity for theft.</li> <li>Cargo bikes making deliveries could cause congestion on pavements.</li> <li>Could mention facilities needed for folding bikes and scooters.</li> <li>Need monitoring of cycle parking use to check whether space continues to be available for cycle parking</li> </ul>
Submission policy with modifications	P	U	P			P	P			U			U		Reduced cycle parking provision could have some further positive effects through reduction of embodied carbon in development through reduced basement excavation and throughout the course of the development’s lifetime. As demand for cycle parking may fluctuate it could have impacts on active travel uptake or involve congestion within the public realm from on-street cycle parking. Use of space for other economic functions could have some positive impacts on the economy.
<b>Commentary</b>	C	C								C			C		Changes to the assessment identified the following changes- <ul style="list-style-type: none"> <li>Economic growth- potentially positive</li> <li>Built environment and public realm - uncertain</li> <li>Transport and movement - uncertain</li> <li>Health- uncertain</li> </ul>

**Modification Assessment 2- Broadgate tall building site**

Main Modification numbers: MM2, MM3, MM52-53, MM56

Introduces a new tall building site at Broadgate and contour changes at the SE corner of the City Cluster. To be inserted into the Key Diagram and Figures 14 and 15. Reference to this site also to be added to Section 2.1, S12 (1), paragraph 11.5.4, 11.5.6

Table 4- Key Diagram and other changes for new Broadgate tall building site

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA		P		U											The assessment identifies potential effects on two objectives with the following: <ul style="list-style-type: none"> <li>• Tall buildings will be focused in the City Cluster and Fleet valley, which are identified as areas suitable for tall buildings.</li> <li>• Managing the location of tall buildings improves the quality and appearance of the built environment, whilst also protecting views</li> </ul>
Submission policy with modifications	P	P		P/N											Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Given the extensive Strategic Views Impact Assessment and Heritage Impact Assessment testing, the additional identification and SE contour changes are not expected to amend the previous assessment in relation to effects on the built environment, public realm or heritage assets.
Commentary	C			C											Changes to the assessment identified the following change- <ul style="list-style-type: none"> <li>• Economic growth- potentially positive</li> </ul>

### **Modification Assessment 3- Policy S12 Tall Buildings**

Main Modification numbers: MM48-51, MM54-55

Changes to Policy S12 relate to:

- Specific reference to the new Broadgate tall building site within part 2) and the supporting text at 11.5.4 and 11.5.6 as being 'suitable for a tall building'
- Part 3) to make reference to the design to respect heritage significance and their settings
- Making explicit that new tall buildings outside the identified locations are likely to have significant impacts on heritage assets
- Making clear that the existence of a tall building on a site outside the identified locations is likely to be a material consideration in planning decisions, and that retrofitting may be appropriate subject to meeting other policy requirements
- To make clear the City Corporations expectations and use of models and visualisations in relation to the historic environment and their cumulative impacts

Table 5- Policy S12 Tall Buildings

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission SA	P/N	P	P	P		P		P		P		P	P		<p>SA identifies effects of draft policy in relation to:</p> <ul style="list-style-type: none"> <li>• Constraints on development of tall buildings could reduce the City’s economic growth potential. Policy S12 encourages tall buildings in areas identified as appropriate, while also identifying areas where tall buildings would be inappropriate, including areas covered by strategic and local views.</li> <li>• Additional constraints on development of tall buildings could reduce economic growth but the backdrops to St Paul’s Cathedral and the Tower of London is already protected by Local View Management Framework views so the impact is likely to be limited.</li> <li>• Managing the location of tall buildings improves the quality and appearance of the built environment with consideration given to the City’s skyline</li> <li>• Tall buildings must have regard to the character and amenity of their surroundings, including the relationship with existing and consented tall buildings.</li> <li>• Policy applies with the Civil Aviation Authority’s maximum height limit of tall buildings for the safety of international flights. 6. Tall buildings must have regard to the significance of heritage assets and their immediate and wider settings.</li> <li>• National and international impact – protects outstanding universal value of UNESCO World Heritage Site.</li> <li>• Integrating development within the existing context, taking into account form, mass, and height, to enhance the overall townscape character.</li> <li>• Policy seeks to protect the public realm from environmental impacts and ensure safe and comfortable levels of wind shear, daylight and sunlight, solar glare, solar convergence, overshadowing.</li> <li>• Policy looks to protect existing open spaces while providing new spaces inside and at the top of buildings.</li> <li>• Promotes accessible building design which will improve the inclusivity of the City.</li> <li>• Policy seeks to improve public realm, with active frontages at ground level and adequate space between buildings to provide a positive pedestrian experience.</li> <li>• Consideration of the views of the city designated by other Local Planning Authorities will promote consistency in preserving protected views.</li> <li>• Achieve exemplar standard of architectural quality, making a positive contribution to the townscape character.</li> <li>• Active frontages at ground floor level to contribute towards a positive pedestrian experience</li> </ul>

Objective	Economic Growth	Built environment and public realm	Safe environment and crime reduction	Heritage Assets	Water Management	Environmental protection	Climate mitigation and resilience	Open Spaces	Biodiversity and urban greening	Transport and movement	Housing	Social and cultural facilities	Health	Education	Conclusions
Submission policy with modifications	P	P	P	P/N		P		P		P		P	P		Identification of an additional site for tall buildings could have some additional positive effects on economic growth with more opportunities for office floorspace. Although additional wording sets out additional protection for heritage assets and their consideration in relation to tall buildings, the plan seeks to minimise the potential for harm; consideration of any harm will still be required on relevant applications and heritage assets and their setting have protections in both other Development Plan policies and legislation.
Commentary	C			C											Changes to the assessment identified the following change- <ul style="list-style-type: none"> <li>• Economic growth- potentially positive</li> </ul>

## Cumulative impacts

The cumulative impacts of all the policy modifications have also been assessed against each objective.

Objective	AT3	Key Diagram	S12	Commentary	Mitigation
Economic Growth	P	P	P	Changes in combination are likely to lead to additional floorspace dedicated to economic development within the city. This will have a likely positive effect on economic development objective.	None required.
Built environment and public realm	U			Potential flexibility in cycle parking standards could have some uncertain impacts on public realm depending on the uptake of cycling, other modes of travel and capacity of the provision on street and within the development.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required.
Safe environment and crime reduction					
Heritage Assets		P/N	P/N	Changes to the locations identified as suitable for tall buildings to include a new site at Broadgate and amendments at the SE corner have potential for some positive and negative impacts on heritage assets.	Policy requires use of models, assessment of impacts on individual heritage assets on a site by site basis
Water Management					
Environmental protection					
Climate mitigation and resilience					
Open Spaces					
Biodiversity and urban greening					
Transport and movement	U			Changes to provision of cycle parking could have uncertain impacts on transport and movement.	Other policies relate to supporting healthy streets approaches.
Housing					
Social and cultural facilities					
Health	U			Provision of cycle parking has potentially uncertain impacts on health, depending on the uptake of active travel modes as a result.	Exceptional circumstances are identified within the policy and strong justification from deviation from cycle parking standards are required. Other policies relate to health and wellbeing.
Education					

## Mitigation measures

In line with guidance potential mitigation measures should be considered where the assessments identify negative effects in order to reduce any negative effects. Some of the effects of policy changes are uncertain